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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

14 **DECLARATION OF MARK A.**  
15 **SENTENAC IN SUPPORT**  
16 **OF OMNIBUS SEALING**  
17 **STIPULATION REGARDING DKT.**  
18 **NO. 2180**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

17 This Document Relates to:  
18 ALL ACTIONS  
19

**DECLARATION OF MARK A. SENTENAC**

I, Mark A. Sentenac, declare as follows:

1. I am a partner of the law firm of King & Spalding LLP, attorney of record for Defendants TikTok Inc., TikTok Ltd., TikTok LLP, ByteDance Inc., and ByteDance Ltd. (“Defendants”) in the above-referenced case. I have personal knowledge of the following facts and, if called as a witness in the above-referenced action, could competently testify to the matters stated herein.

2. I submit this declaration in support of (i) the Omnibus Sealing Stipulation in connection with the Parties’ Joint Letter Brief on Whether Plaintiffs are Entitled to Additional Written Discovery, Document Productions, and a Deposition regarding Eugenia Cooney (hereinafter “Joint Letter Brief”) (ECF No. 2179, ECF No. 2181 (corrected)), together with a Joint Temporary Sealing Motion (ECF No. 2180).

3. The following portions of the Parties’ Joint Letter Brief contain confidential information, including excerpts from confidential internal TikTok documents and confidential deposition transcripts, protected from disclosure under the Court’s October 11, 2024 Third Modified Protective Order (Dkt. No. 1209).

Dkt. No.	Description	Requested Action	Language to Be Redacted	Basis for Sealing	Previously Sealed
2180-1	Joint Letter Brief	Sealed	Page 4, third paragraph, lines 4, 5 redact the words after “reported” to “by”, and the words after “external” to “partners”	Contains confidential information excerpted from confidential internal TikTok documents and/or deposition testimony.	No
2180-1	Joint Letter Brief	Sealed	Page 5, first paragraph, lines 6-8, redact everything after “TikTok feared” to “Further,”	Contains confidential information excerpted from confidential internal TikTok documents and/or deposition testimony.	No

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2           4.       The TikTok Defendants do not disclose this information publicly in the ordinary  
3 course of business. It is highly sensitive and confidential.

4           I declare under penalty of perjury under the laws of the Georgia that the foregoing is true  
5 and correct. Executed on the 12th day of September, 2025 at Atlanta, Georgia.

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7                               /s/ Mark A. Sentenac

8                               Mark A. Sentenac  
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